

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA  
SOUTHERN DIVISION**

BOBBY SINGLETON, <i>et al.</i> ,	)	
	)	
<i>Plaintiffs</i> ,	)	
	)	
v.	)	Case No. 2:21-cv-01291-AMM
	)	
JOHN MERRILL, in his official	)	THREE-JUDGE COURT
capacity as Alabama Secretary of State,	)	
	)	
<i>Defendant.</i>	)	

**SECRETARY OF STATE JOHN H. MERRILL’S  
MOTION FOR PROTECTIVE ORDER (UNOPPOSED)**

Secretary of State John H. Merrill respectfully moves for entry of a protective order that will govern the use of discovery material in which third parties have a privacy interest. Entry of such an order is within this Court’s discretion pursuant to Fed. R. Civ. P. 26(c). The parties have consulted, and Plaintiffs do not oppose this motion. In further support of this motion, Secretary Merrill states as follows:

1. Plaintiffs have served discovery requests seeking production of documents, electronically stored information, or other information in which third parties have a privacy interest. For example, Plaintiffs seek production of excerpts of Alabama’s voter registration database.

2. The parties have agreed in principle that the database production will include only fields necessary to litigate this case and that personally-identifying

information will be omitted to the extent possible. Nonetheless, the parties agree that to protect third parties, a protective order is appropriate to restrict the use of confidential information and to prohibit unwarranted disclosure.

3. The parties have negotiated the terms of a proposed protective order that is attached hereto as Exhibit A for the Court's consideration and agree that its entry will facilitate discovery.

WHEREFORE, Secretary Merrill moves the Court to enter the attached Protective Order.

*Respectfully submitted,*

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s/ James W. Davis  
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### **CERTIFICATE OF SERVICE**

I certify that on December 14, 2021, I electronically filed the foregoing notice with the Clerk of the Court using the CM/ECF system, which will send notice to all counsel of record.

s/ James W. Davis  
Counsel for Secretary Merrill